

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MINNEAPOLIS FIREFIGHTERS'
RELIEF ASSOCIATION, *et al.*,

Plaintiffs,

v.

MEDTRONIC, INC., *et al.*,

Defendants.

Civil No. 0:08-cv-06324-PAM-AJB

**LEAD COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

Pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Proposed Settlement and Providing for Notice dated July 23, 2012, and upon the Joint Declaration of Karl L. Cambronne, Salvatore J. Graziano, Ramzi Abadou, Jeff A. Almeida, and James M. Hughes in Support of (A) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds and (B) Lead Counsel's Motion For An Award of Attorneys' Fees and Reimbursement of Expenses; the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses; and all other papers and proceedings herein, Lead Counsel, will and do hereby move this Court on November 8, 2012 at 9:45 a.m. in the Courtroom of the Honorable Paul A. Magnuson, at the Warren E. Burger Federal Building and United States Courthouse, 316 North Robert Street, St. Paul, MN 55101, or at such other location and time as set by the Court, for entry of an Order awarding attorneys' fees and reimbursement of litigation expenses to

Lead Counsel and approving the reimbursement of costs and expenses of Lead Plaintiffs and additional certified Class Representative Westmoreland County Employee Retirement System.

Dated: October 4, 2012

Respectfully submitted,

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